

United States District Court  
Southern District of Texas  
FILED

AO 91 (Rev. 11/11) Criminal Complaint

MAR 19 2019

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

David J. Bradley, Clerk

United States of America

v.

Isabel Alvarez (1993/US)

Case No.

M-19-0651M

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 19, 2019 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

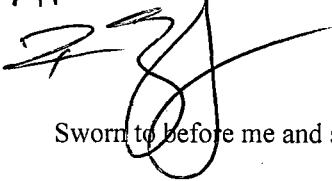
<i>Code Section</i>	<i>Offense Description</i>
21 USC § 952	Illegal Importation of a Controlled Substance / Approximately 14.94 Kilograms of Cocaine, a Schedule II Controlled Substance.
21 USC § 963	Conspiracy to Illegally Import a Controlled Substance / Approximately 14.94 Kilograms of Cocaine, a Schedule II Controlled Substance.

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.

Approved by




Sworn to before me and signed in my presence.

Date: 03/20/2019City and state: McAllen, Texas  
Complainant's signature

Nicholas Ilg, HSI Special Agent

Printed name and title

  
Judge's signature

U.S. Magistrate Judge J. Scott Hacker

Printed name and title

**Attachment "A"**

I, Nicholas Ilg, am a Special Agent of the United States Homeland Security Investigations (HSI) and have knowledge of the following facts. The facts related in this attachment do not reflect the totality of information known to me or other agents/officers, merely the amount needed to establish probable cause. I do not rely upon facts not set forth herein in reaching my conclusion that a complaint should be issued, nor do I request that this Court rely upon any facts not set forth herein in reviewing this attachment in support of the complaint.

1. On March 19, 2019, Homeland Security Investigations in McAllen, Texas, (HSI McAllen) received a request for investigative assistance from the U.S. Customs and Border Protection Office of Field Operations at the Pharr Port of Entry (POE) in Pharr, Texas. CBP Officers (CBPOs) detained Isabel Alvarez (hereafter ALVAREZ), a citizen of the United States, while attempting to enter the U.S. with approximately 14.94 kilograms of cocaine concealed within the rocker panels of the vehicle she was driving.
2. During primary inbound inspection, CBPOs obtained a negative oral declaration for fruits, food, alcohol, tobacco, drugs, weapons and currency over \$10,000.00. ALVAREZ claimed to be traveling from visiting her grandmother in Reynosa, Tamaulipas, Mexico to her residence in Donna, Texas. CBPOs referred ALVAREZ and the vehicle to secondary inspection for an intensive examination.
3. During secondary inspection, a CBP K-9 drug detection team conducted a free air inspection which resulted in a positive alert for the odor of controlled substance(s) emanating from the vehicle.
4. CBPOs conducted a non-intrusive X-Ray inspection and discovered anomalies in the rocker panels of the vehicle.
5. A physical search of the vehicle revealed a total of 12 packages concealed within both rocker panels of the vehicle. CBPOs weighed the 12 packages, which weighed approximately 14.94 kilograms on a calibrated scale. CBPOs field tested the substance inside the packages, with a presumptive positive result for the characteristics of cocaine.
6. HSI Special Agents responded to the Pharr POE to assist in the investigation. HSI Special Agents interviewed ALVAREZ, who admitted she knew she was transporting drugs into the United States and was paid for the smuggling event. ALVAREZ admitted to one previous smuggling event.